

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION STUDENT-  
ATHLETE CONCUSSION INJURY  
LITIGATION**

**MDL No. 2492**

**Master Docket No. 1:13-cv-09116**

**This Documents Relates To:  
All Cases**

**Judge John Z. Lee**

**Magistrate Judge Geraldine Soat Brown**

**DECLARATION OF SHANNON M. MCNULTY**

I, Shannon M. McNulty, pursuant to 28 U.S.C. § 1746, hereby declare on oath as follows:

1. I am a partner at Clifford Law Offices, P.C. I am over the age of eighteen and am fully competent to make this declaration. I make this declaration based upon person knowledge unless otherwise indicated. If called upon to testify as to the matters stated herein, I could and would competently do so.

2. My firm represents Adrian Arrington, one of the original class representatives. Over the course of this litigation, my firm, along with attorneys at Edelson PC and Gordon Law Offices, Ltd. successfully raised, on behalf of Mr. Nichols and Mr. Arrington, a number of jointly filed objections to the various settlements proposed by Class Counsel and the NCAA. As set out in Mr. Nichols' Petition for and Memorandum in Support of an Award of Attorneys' Fees and Service Award [Doc. 330], our firms' efforts in this matter led to substantial improvements to the settlement that earned preliminary approval from the Court.

3. As detailed in the chart below, I have logged 25.5 hours in uncompensated time advancing objections on behalf of Mr. Nichols and Mr. Arrington, resulting in a total balance of

\$15,300.00 in attorneys' fees, exclusive of costs. The time spent in advancing objections on behalf of Mr. Nichols, Mr. Arrington and those similarly situated, included court appearances, client communication, development of litigation strategy, and the drafting and filing of various pleadings. In addition, the chart reflects the level of experience, billable rates, and the hours worked on this matter.

<b>ATTORNEY (Position)</b>	<b>YEARS OF EXPERIENCE</b>	<b>HOURS</b>	<b>HOURLY RATE</b>	<b>TOTAL</b>
Shannon McNulty (Partner)	12	25.5	\$600	\$15,300.00

4. The attorney rate used to calculate the base lodestar are comparable to those charged by attorneys with equivalent experience, skill, and reputation for similar services in the Chicago legal market, as well as other comparable markets throughout the country.

5. It is the policy of my firm that attorneys are responsible for keeping track of their billable time by at least the tenth of the hour through billing management software known as Sage Timeslips and records maintained in the ordinary course of our firm's business. We have carefully reviewed the reports generated by this software and have removed entries of time deemed to be unnecessary or duplicative.

6. In my opinion, the expenditure of my time on this matter is reasonable.

7. The hourly rates used to calculate the lodestar figure are the same as those charged to our firm's hourly paying clients.

8. My rates have been approved in the Northern District of Illinois as reasonable.

I declare under penalty of perjury that the foregoing is true and correct.

Date: January 13, 2017

/s/ Shannon M. McNulty  
Shannon McNulty

